

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LINDSEY SHEPARD,

Plaintiff,

v.

HOWARTH et al

Defendants.

2014 JUL 17 P 4: 14
Civil Action No. 1:14-cv-10301-RGS

PROPOSED PRETRIAL SCHEDULE

The plaintiffs prepared the following report.

The Plaintiffs request the initial pretrial conference required under Fed. R. Civ. P. 16 and LR 16.2 be held on or about August 4, 2014.

The plaintiffs **do not request** that the pretrial be held by telephone.

Description of the Case.

(1) Concise factual summary of plaintiff's claims: Plaintiff alleges that defendant Fredrick J. Hanna violated the Fair Credit Reporting Act, Telephone Consumer Protection Act, 47 U.S.C. §227(a) et seq., and the Massachusetts Unfair & Deceptive Trade Practices

Plaintiffs assert the need for a protective order to be entered by the Court to protect against public disclosure of certain confidential information which the Plaintiff anticipates it will be requested by the Defendant in discovery also.

Concise factual summary of defendant's claims/defenses: TBD

Statement of Fredrick J. Hanna ("Fredrick").TBD

Concise factual summary of defendant's FREDRICK J HANNA claims/defenses:

Fact Discovery : Plaintiff request 6 months for written discovery:

The plaintiffs recommend that the Court establish the following fact discovery deadlines and limitations:

- (1) The parties must make their initial disclosures under Fed. R. Civ. P. 26(a)(1) on or before August 19, 2014.
- (2) The parties must complete any physical or mental examinations under Fed. R. Civ. P. 35 by N/A.
- (3) The parties must commence fact discovery procedures in time to be completed on or before (6 months) February 4, 2015.

Expert Discovery.

- (1) The plaintiff anticipates that they **will** require expert witnesses at the time of trial.
 - (A) The plaintiff anticipates calling 2 experts in the fields of: **TBD**.
- (2) The plaintiffs propose that the Court establish the following plan for expert discovery:
 - (A) Initial experts.

The identity of any expert who may testify at trial regarding issues on which the party has the burden of persuasion must be disclosed on or before **TBD**.

The initial expert written report completed in accordance with Fed. R. Civ. P. 26(a)(2)(B) must be served on or before **TDB**.

Rebuttal experts TBD.

The identity of any experts who may testify in rebuttal to any initial expert must be disclosed on or before December 12, 2014.

Any rebuttal expert's written report completed in accordance with Fed. R. Civ. P. 26(a)(2)(B) must be served on or before January 7, 2014

All expert discovery must be completed by February 4, 2015.

Other Discovery Issues.

- (1) **Protective Order:** Plaintiffs agree that a protective order is necessary to protect against public disclosure of certain confidential and proprietary information which the parties anticipate will be requested in discovery. The parties agree to jointly submit a proposed protective order or a report identifying areas of disagreement.
- (2) **Discovery of Electronically Stored Information.** Plaintiffs agree parties should discuss issues about disclosure or discovery of electronically stored information as required by Fed. R. Civ. P. 26(f), including the form or forms in which it should be produced and inform the Court of the following agreements or issues:
- (3) **Claims of Privilege or Protection.** Plaintiffs agree parties should discuss issues about claims of privilege or of protection as trial-preparation materials as required by Fed. R. Civ. P. 26(f), including whether the parties agree to a procedure to assert these claims after production and request the Court to include the following agreement in the scheduling order:

Defendants Fredrick J. Hanna will submit a privileged log to the court on or before September 1, 2014

Proposed Motion Schedule.

The parties propose the following deadlines for filing motions:

- (1) Motions seeking to join other parties must be filed and served by December 15, 2014 with oppositions due 15 days after their filing.
- (2) Motions seeking to amend the pleadings must be filed and served by December 15, 2014 with oppositions due 15 days after their filing.
- (3) All other non-dispositive motions must be filed and served by January 1, 2014.
- (4) All dispositive motions must be filed and served by March 1, 2015.

Trial-Ready Date.

- (1) The plaintiffs propose that the case will be ready for trial on or after on or after 30 days following dispositive motions.
- (2) The plaintiffs propose that the final pretrial conference be held on or before on or before 30 days before trial.
- (h) Defendants Insurance Carriers/Indemnitors. **TBD**

List all insurance carriers/indemnitors, including limits of coverage of each defendant or statement that the defendant is self-insured.

Settlement.

- (1) The plaintiff will discuss settlement before the initial pretrial conference, by the plaintiff making a written demand for settlement and defendant making a written response to the plaintiff's demand.
 - (2) The plaintiff propose that a settlement conference be scheduled to take place before March 1, 2015.
- (j) Trial by Magistrate Judge.

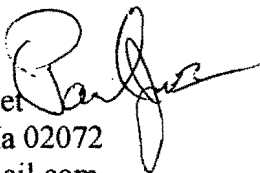
The plaintiffs do not consent to a magistrate judge.

DATE: July 15, 2014

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